

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY

GEORGE LEVY,

Plaintiff,

v.

AT&T SERVICES, INC.,

Defendant.

No. 3:21-cv-11758-FLW-LHG

**DEFENDANT'S MOTION TO
COMPEL ARBITRATION AND
STAY PROCEEDINGS**

Oral Argument Requested

PLEASE TAKE NOTICE that Defendant AT&T Services, Inc. ("AT&T") will move before Honorable Freda L. Wolfson at the Clarkson S. Fisher Building & U.S. Courthouse, 402 East State Street, Trenton, New Jersey, on September 6, 2021 at 10:00 A.M. or as soon thereafter as counsel may be heard, for an order compelling arbitration of Plaintiff George Levy's claims and staying proceedings based on his binding pre-dispute arbitration agreement with AT&T, pursuant to 9 U.S.C. § 3.

In support of this Motion, AT&T will rely on the attached Memorandum of Law, dated August 6, 2021; the Declaration of Brandy Giordano with accompanying Exhibits 1 through 5, dated July 28, 2021; the Declaration of Margaret Rooney-McMillen, dated August 2, 2021; the Declaration of Michael D. Albert, dated July 26, 2021; the Declaration of Kenneth W. Gage, dated August 5, 2021; and all other pleadings and papers herein. Per the Judicial Preferences of Honorable Freda L. Wolfson, a Proposed Order is submitted herewith via electronic mail, in MS Word format.

Oral argument is respectfully requested in connection with this Motion.

Dated: August 6, 2021

Respectfully submitted,

/s/ Daniel S. Richards

Daniel S. Richards
Kenneth W. Gage*
Sara B. Tomezsko*
Paul Hastings LLP
200 Park Avenue
New York, NY 10166
(212) 318-6000

*Attorneys for Defendant
AT&T Services, Inc.*

* *Pro Hac Vice* application submitted herewith

CERTIFICATE OF SERVICE

I hereby certify that on August 6, 2021, a copy of the foregoing Defendant's Motion to Compel Arbitration and Stay Proceedings and all supporting documents were filed electronically and served via CM/ECF to all counsel of record.

/s/ Daniel S. Richards

Daniel S. Richards